

Plaintiff Securities and Exchange Commission hereby moves the Court to approve the proposed settlement with Defendants Caledonian Bank Ltd. and Caledonian Securities Ltd., together with such other and further relief as the Court deems just and proper. The Commission is filing contemporaneously herewith a Memorandum of Law in support of the proposed settlement to assist the Court in determining whether the settlement is fair, reasonable and in the

public interest, and also to address some of the questions the Court raised in its Opinion and Order entered on November 10, 2015 (ECF No. 140).

Dated: Washington, D.C.  
February 9, 2016

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Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I certify that on February 9, 2016, I electronically filed the foregoing NOTICE OF MOTION TO APPROVE THE SEC'S PROPOSED SETTLEMENT WITH DEFENDANTS CALEDONIAN BANK, LTD. AND CALEDONIAN SECURITIES, LTD. using the CM/ECF system, which will send notification of such filing to counsel for Defendants Caledonian Bank Ltd., Caledonian Securities Ltd. and Vermont Capital, S.A. at the following addresses:

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